

Federal Defenders  
OF NEW YORK, INC.

Southern District  
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March 29, 2024

**BY ECF**

The Honorable Judge Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Morrow-Wu et al  
23 Cr. 90 (AKH)**

Dear Judge Hellerstein:

With the consent of the Pretrial Services Agency, I write to respectfully request that the Court modify the conditions of Mr. Matthew Morrow-Wu's bond to allow him to leave his residence three times per day—at 6:00am, 12:00pm, and 6:00pm—so that he may take his dog on 15-minute walks in his neighborhood.

On March 7, 2024, Your Honor granted Mr. Morrow-Wu's request to modify the conditions of his bond to allow him to reside permanently with Mr. Ho, who resides at 24 Rock Street, Jersey City, New Jersey 07306. All other conditions of his release, including home detention, were kept in place. Since his release in June of 2023, Mr. Morrow-Wu has remained compliant with all conditions of his pretrial supervision. As mentioned above, the Pretrial Services Agency for the District of New Jersey (Mr. Morrow-Wu's supervising jurisdiction) has no objection to this request. The Government's position was requested but has not yet been received.

Thank you for your consideration of this request.

Respectfully submitted,  
\_\_\_\_\_  
/s/  
Zawadi S. Baharanyi  
Assistant Federal Defender  
(917) 612-2753

cc: AUSAs Jerry Fang/Henry Ross  
USPSO Andrew Dziopa (DNJ)

**SO ORDERED:**

\_\_\_\_\_  
/s/ Alvin K. Hellerstein  
**HONORABLE ALVIN K. HELLERSTEIN**  
**United States District Judge**  
4/1/24